

I. Project Title and Purpose Statement

Project title: Empowering South Los Angeles Residents to Improve Health Enforcement

Summary: Environmental issues such as insect infestations, rodents, mold, and other housing code violations are known to impair the health of residents, especially children, who are susceptible to asthma, lead poisoning, and other illnesses resulting from exposure to indoor air pollution and toxic substances. To improve the health and living conditions of residents in the target communities, Inner City Law Center (ICLC) will educate tenants about housing-related health issues, encourage tenants to file health complaints, cooperate with the Los Angeles County Department of Public Health (LACDPH) to improve the effectiveness of inspections, and empower tenants to demand that landlords use Integrated Pest Management (IPM) strategies to effect long-term improvement in the health and environmental conditions of their homes.

Location: South Los Angeles, California, Zip Codes 90044 and 90008

Related Environmental Statutes:

Clean Air Act, Section 103(b)(3): conduct research, investigations, experiments, demonstration projects, surveys, and studies (including monitoring) related to the causes, effects (including health and welfare effects), extent, prevention, and control of air pollution.

Toxic Substances Control Act, Section 10(a): conduct research, development, monitoring, public education, training, demonstration projects, and studies on toxic substances.

Federal Insecticide, Fungicide, and Rodenticide Act, Section 20(a): conduct research, development, monitoring, public education, training, demonstration projects, and studies on pesticides

Community Climate Resiliency Focus: N/A

II. Environmental and Public Health Information about the Affected Community

Local Environmental and Public Health Issues to be addressed:

1. *Slum housing conditions:* Slum housing damages the health of families and of neighborhoods, but it is especially harmful for the children who live there. Exposure to mold, rats, cockroaches, bed bugs, and lead-based paint can be devastating to a child's health, causing asthma, bronchitis, pneumonia, eye problems, and developmental delays due to lead poisoning. By some estimates, as many as 48,000 people in Los Angeles get sick each year from living in slum conditions.

2. *Infrequent and ineffective health inspections:* Tenants living in slum conditions rely on government enforcement agencies that force landlords to comply with health and housing codes. Without quality enforcement, tenants are left with no way to advocate for healthier homes. Inspectors lack adequate access to assess building-wide conditions, and inspections are

often superficial, relying on visual assessment during daylight hours although pests most often come out at night.

3. Landlord discretion in addressing violations: Landlords cited for housing code violations often try to correct them cheaply by spraying store-bought insecticides, which are both ineffective, briefly suppressing infestation without addressing the root cause, and harmful to the health of residents, exacerbating health and respiratory issues.

Previous Results:

In 2013, ICLC organizers provided information on tenants' rights to over 3,200 families. ICLC helped over 500 tenants living in slum housing to obtain safe and habitable housing and recover more than \$1.7 million in damages from slumlords.

In 2013-2014, workers from ICLC, in partnership with Esperanza Community Housing Corporation, Strategic Actions for a Just Economy (SAJE), St. John's Child Well Center, and Neighborhood Legal Services conducted the Trinity Park Pilot Project to systematically improve health outcomes through Health Department inspections. Trinity Park is a neighborhood in Los Angeles zip code 90011, bounded by Washington, Adams, Maple, and San Pedro. Organizers from SAJE and ICLC and *promotores* from Esperanza organized tenants in selected buildings that were then referred to LACDPH for inspection. The organizers

- worked with residents to ensure that DPH inspections were thorough;
- documented the level and extent of infestation;
- worked with landlords and a qualified IPM consultant to implement IPM strategies, including necessary building repairs;
- ensured that repairs and re-inspections were completed so as to accommodate disabled residents.

Three of four property owners in this project converted to regularly using IPM, thus eliminating infestations and reducing tenants' exposure to toxic chemicals. The fourth property is not yet resolved. This pilot served as a stepping stone to increasing the effectiveness of public health inspections. Community-based organizations were able to come together and meet with DPH to troubleshoot issues of habitability and health inspection. Each group learned from the others, and together determined how to make inspections improve indoor air quality. Three of four owners sealed off all entry and harborage locations and used low-toxic insecticides to eliminate the existing infestations. For this pilot, our focus was roaches; in the future we plan to work with buildings with other infestations, such as rodents and bedbugs. Moving forward, we will promote a more robust IPM that takes into account food and water supplies like plumbing and ceiling leaks.

Motives for selecting this community:

One quarter of Los Angeles residents live on incomes below the federal poverty level, and almost 10% live on incomes that are less than 50% of the poverty level. Over half of renters spend more than 30% of their income on rent, and roughly a third spend over 50% of their income on rent. Los Angeles has a severe shortage of affordable housing for its large population

of low-wage workers. And substandard housing is no accident. The slumlord's basic business model is to maximize rents and invest as little as possible in upkeep. As slumlords milk buildings for rents, the buildings deteriorate, with dangerous consequences for the tenants. Too often, low-income tenants live in unhealthy and unsafe conditions that fail to comply with state and local building and health laws, and with hazards that endanger the health and safety of occupants. Children and the elderly are the most at risk, and unhealthy conditions can be devastating to their health.

In 2011, a US Census Bureau survey of renter-occupied units in Los Angeles and Long Beach found that 449,100 were infested with cockroaches; 35,500 were infested with rats; 46,400 had severe problems with their plumbing, heating, electricity, or upkeep; and 62,300 lacked consistently working toilets.

The target zip codes 90044 and 90008 include some of the most densely populated and low-income neighborhoods in Los Angeles. Zip code 90044 is in the historic South Central area, and 90008 is in the Crenshaw area, both neighborhoods known for their history of poverty and violence. The California Health Interview Survey (CHIS) shows that these two zip codes have some of the highest rates of asthma: 13% of residents in 90044 have asthma and 16% in 90008. The City of Los Angeles compiles a list of the buildings with multiple and persistent reported health violations; 90008 is the most frequently represented zip code on that list. ICLC's work in the community confirms that many of the buildings with the worst housing conditions are in these two zip codes.

III. ICLC's Historical Connection to the Affected Community

ICLC's mission is to ensure access to decent, safe and fully habitable housing for the enormous number of homeless and working poor families and individuals residing in Los Angeles' inner city neighborhoods. Since 1980, Inner City Law Center (ICLC) has provided free legal services to the poorest and most vulnerable residents of Los Angeles. The only legal-services provider located on Skid Row in downtown Los Angeles, ICLC's staff of 42 provides quality legal representation for people who have nowhere else to turn. We fight for justice for low-income tenants, working poor families, veterans, people living with HIV/AIDS, immigrants, and people who are homeless or disabled.

Soon after its launch, ICLC started handling complaints about miserable living conditions throughout Los Angeles' downtown neighborhoods. In 1982, a young mother, her five little girls in tow, showed up at the door of ICLC's trailer office with a large plastic bag. In the bag was a foot long rat (not counting the tail) that had attacked all five of her children. Because the rat was too big to catch in a conventional trap, the young mom stayed up several nights in a row, chasing it around the apartment until she was able to bash it over the head with a board. ICLC promptly accepted the case and the rat was put in formaldehyde and named Melvyn after the owner of the building. A stream of mothers from the building soon appeared at the ICLC trailer, each with her own four-legged exhibits. Soon the ICLC trailer, adorned with rats in glass jars, reeked of formaldehyde.

Last year, ICLC provided legal and advocacy services to over 5,000 persons, nearly all living below federal poverty guidelines. Approximately 63% are Latino, 20% are African American, 11% are White (not Latino), and 6% belong to smaller ethnic groups. Approximately half of our clients are female and half are male. The majority of our clients in slum housing are families with children. Many of our homeless clients have emotional or physical disabilities. A large number of our clients are undocumented immigrant families. Many lack English skills, and some are illiterate even in their native language.

ICLC's Healthy Homes Project combines outreach, education, tenant organizing, and litigation to address housing-related health hazards in these neighborhoods. Our organizers and attorneys participate in every major healthy home coalition in Los Angeles, including the Healthy Homes Collaborative, the Asthma Coalition of Los Angeles County, and the Southern California Health and Housing Council. We are members of the California Healthy Housing Coalition, a statewide coalition that has successfully pushed through two pieces of legislation that promote IPM. Our staff frequently present at professional conferences, including the last two HUD National Healthy Homes Conferences.

ICLC's unique organizing model begins with tenant outreach and education. Our organizers are on the streets, cold knocking on doors, offering information to tenants about their rights as renters and the effects of slum conditions on the health of their families. Organizers are trained in skills to quickly establish rapport with tenants. Through guided reflection, organizers help tenants to truly think through and grapple with the slum conditions in their homes. Tenants become empowered and see our presence as an opportunity to join with their neighbors to stand up against their landlords and demand healthy homes. Organizers then introduce **ICLC's Strategy for a Healthy Home**, and begin to shape the strategy to accommodate the demands of the tenants. At its foundation, the Strategy for a Healthy Home includes making written complaints to the landlord, filing complaints with code enforcement agencies, and documenting the slum conditions and their effects on the health of residents. Depending on the landlord's reaction to complaints, some tenants also need to respond to tactics of intimidation, in which case ICLC organizers and attorneys provide legal support to the tenants. Our organizing campaigns usually last a year, during which we meet with individual tenants weekly and host meetings once a month. ICLC initially works with property owners, encouraging them to make the necessary repairs. But because ICLC works with the very worst buildings, most of our target buildings do not get the repairs and maintenance that tenants demand. When this happens, we litigate to force the owner to make necessary repairs and compensate tenants for their losses.

The Strategy for a Healthy Home relies on code enforcement, so ICLC has a vested interest in making sure that all agencies are doing quality inspections that help to improve health conditions for residents. By improving the code enforcement inspections of the LACDPH, this project will help many tenants to use the Strategy for a Healthy Home independently, without the need for ICLC to be present throughout the campaign.

Collaboration and Partnership

All of ICLC's work is done in collaboration with nonprofit and government partners. Over more than 30 years of work on housing and homelessness, ICLC has built relationships with community coalitions, tenant groups, housing providers, legal service organizations, homeless shelters, health providers, pro bono law firms, the local courts, and government agencies.

Because of ICLC's long history of working to eradicate slum conditions, and our proven track record of collaborating to implement new programs, groups throughout Los Angeles regard us as experts in this field. Our organizers give scores of presentations each year to attorneys, government agencies, parent groups, and other non-profits on the connections between housing and health, with a focus on how to use government code enforcement to improve air-quality in the home. In 2014, our Director of Tenant Organizing, Director of Public Policy, and Senior Tenant Organizer presented information to a group of over 50 health inspectors from Los Angeles County at an annual training conference. Additionally, our attorneys provide legal support to other housing rights groups who use our organizing model and strategy to advocate for tenants.

IV. Project Description

July 2015: Develop Community Outreach Plan

- Working in zip codes 90008 and 90044, areas that have a high concentration of rental properties, a preponderance of low-income tenants, and different ethnic profiles, one predominantly Latino, the other predominantly African American, ICLC organizers will identify 20 large, multi-unit buildings for initial contact and surveys.
- ICLC organizers will develop educational materials to be used in initial contacts.
- ICLC will work with community volunteers from past campaigns to develop a neighborhood outreach plan.

August- September 2015: Educate the Community; Select Target Buildings

ICLC's Organizing Team and community volunteers will conduct door-to-door outreach to

- educate tenants about LACDPH inspections:
 - Inspections are performed annually, but tenants must allow access.
 - Tenants can request inspections.
 - LACDPH inspects only for health hazards: mold, infestations, lead.
 - Inspectors can cite the direct cause of health hazards they discover, so tenants need to show the inspector issues such as mold, water leaks, and flaking paint.
- empower tenants to participate in inspections:
 - Slum conditions are *not* an inevitable part of life; tenants have a right to live in healthy homes.
 - Understand connections between slum conditions and health issues their families are experiencing.
 - Build courage to speak up and demand change.

- conduct preliminary habitability surveys in the units visited:
 - visual assessment
 - tenant habitability questionnaire
 - minors with respiratory issues

During this phase, twenty buildings will be surveyed, and two buildings that are found to have the worst slum conditions will be chosen for more intensive work.

At least 200 tenants will be contacted, surveyed about their experience with habitability issues, and offered education about housing-related health hazards and how LACDPH can be a resource to them.

Outcomes: Residents of surveyed buildings show increased awareness of LACDPH inspections as a resource.

October 2015-January 2016: Build trust; file health complaints

ICLC's organizing team will visit the two target buildings weekly, meeting with residents privately and in groups to build trust with the residents and educate them further about how to use LACDPH inspections as a resource to improve health conditions in their homes.

Outcomes: 80% of tenants in the two target buildings file complaints requesting LACDPH inspection of their units.

January-February 2016: Conduct inspections

LACDPH will inspect units in response to tenants' complaints.

ICLC and Esperanza will conduct follow-up inspections and monitor glue traps to more effectively measure infestations.

Esperanza will conduct health surveys with the tenants who file complaints.

ICLC, Esperanza, and tenant representatives will meet with LACDPH to compare data from the inspections.

Outcomes: The project will produce concrete examples of shortcomings in the inspection process, which will be used to develop greater agreement among parties as to how inspections can be made fully effective.

October 2015-March 2016: Integrated Pest Management Advocacy

ICLC will contact building owners to introduce the project and educate owners about IPM practices, their effectiveness and cost effectiveness.

ICLC will support residents in taking necessary steps to have landlords institute effective IPM measures to remediate identified infestations:

Securing a copy of the inspection report

Requesting IPM measures

Following up with the landlord

LACDPH will conduct a follow-up site visit to assess compliance.

Outcomes: Landlords implement Integrated Pest Management in their buildings.

April 2015-June 2016: Evaluation

ICLC and Esperanza will follow up with residents to assess extent to which IPM assisted in improving the healthfulness of their housing:

Repeat health surveys

Residents report on conditions in their units

Glue traps monitored

Outcomes: Residents report improved health: fewer asthma attacks; fewer ER visits

Residents report reduced or eliminated infestations

Glue trap monitoring confirms reduced or eliminated infestations

How ICLC will work with partners to address the local issues:

Esperanza Community Housing Corporation works to achieve comprehensive and long-term community development in the Figueroa Corridor, a broad swath of South-Central Los Angeles. Its core programs, which serve 126,000 people each year, work to provide and preserve affordable housing, promote accessible health care, pursue economic development, secure environmental justice, and stimulate involvement in the arts and culture. Esperanza seeks to broaden its impact by entering strategic partnerships with community members, nonprofits, businesses, and policymakers.

Esperanza's *promotores*, trained community health leaders, conduct community education, home visits, hazard assessment, and remediation to help parents prevent lead poisoning and asthma triggers from injuring their families. For this project, *promotores* will be responsible for conducting pre- and post- IPM health assessments of tenant families in the target buildings and coordinating with ICLC staff in monitoring glue traps to assess reduction of infestation.

Through our previous collaboration, ICLC has learned that LACDPH has a difficult time accessing and inspecting multi-unit housing. For most buildings, ranging from 5 to 40 units, inspectors are only able to speak to tenants from one or two units, and most times are not able to physically enter the unit to conduct the inspection. During our initial pilot program, we demonstrated that with the assistance of community-based organizations (CBOs), inspectors were able to access 80% of the units, and perform initial, follow-up, and compliance inspections for these units.

Through this collaboration, CBO's were also able to engage with the leadership of LACDPH including the Bureau and Division Directors, Regional Field Office Directors, and several field inspectors. At the end of the pilot, LACDPH leadership requested that we continue to work together to develop a strategy that will increase the amount of inspections, get more repairs by landlords, and reduce and health risks in the homes that are caused by repairs. LACDPH knows that IPM can have effects similar to those the Federal lead-safe RRP rule has had on reducing lead poisoning cases.

V. Organizational Capacity and Programmatic Capability

ICLC's Director of Finance and Administration oversees the financial administration of all grants. Expenses and revenue received by the organization are recorded in the general ledger with a unique account code for tracking program costs. ICLC's accounting procedures are compliant to OMB Circular A-122. ICLC undergoes annual program-specific audits and a complete audit of financial statements by an independent auditor, assessing ICLC's internal controls and compliance with grant requirements. Multiple audits have confirmed proper use of all funds.

In the past five years, ICLC has received federal funds only as a sub-contractor to the City and County of Los Angeles, not as a direct grantee. From 2009 through 2012, ICLC received funds totaling \$1,057,346 from Los Angeles Homeless Services Authority under the federal Homelessness Prevention and Rapid Rehousing Program. From 2009 through 2013, ICLC contracted with the Los Angeles Housing and Community Investment Department to provide education and outreach services through the HUD Lead Hazard Remediation Program, for total funding of \$170,300. Since 2011, ICLC has contracted with the Los Angeles Housing and Community Investment Department to provide services through the federal program Housing Opportunities for Persons With AIDS (HOPWA). Total funding of that contract, which has been extended through April 2015, is \$470,761. In all instances, goals were met and progress reports were complete and timely.

This project, an element of ICLC's ongoing Healthy Homes Project, will be managed by Director of Tenant Organizing Francisco Covarrubias. Since 1980, ICLC has educated and organized tenants to demand and enforce their right to live in healthy homes. Last year, ICLC's four-member Organizing Team provided information on tenants rights to over 3,200 families and helped more than 500 tenants living in slum housing to obtain safe and habitable housing and recover damages from slumlords. The Trinity Park Pilot Project, discussed above, demonstrates the potential of ICLC's approach, developed in partnership with Esperanza and LACDPH, to improve the quality of health inspections in rental housing and increase their value in reducing slum conditions that include indoor air pollution and the prevalence of toxic substances.

To support its work with tenants and landlords, ICLC is also involved in housing policy. In 1997, ICLC spearheaded the creation of the Blue Ribbon Committee on Slum Housing, which resulted in the creation of the Los Angeles Housing Department's Systematic Code Enforcement Program, a nationally recognized inspection process.

VI. Qualifications of the Project Manager

Inner City Law Center's Director of Organizing, Francisco Covarrubias, will manage the project. Raised in South Central Los Angeles, Francisco now works in the communities where he grew up. He has worked as a Tenant Organizer at ICLC for four years and was promoted to Director in 2013. As an organizer, he informs tenants about city programs, healthy homes practices, and legal resources. Prior to joining ICLC, Francisco organized with Unite Here Local 11's Organizing Beyond Barriers program. Francisco previously worked as a field representative for California Assemblyman Mike Gatto, where he gained valuable experience in government casework and constituent outreach.

Francisco leads a team of four organizers who educate and organize tenants so as to empower them to force landlords to repair buildings and improve unhealthy conditions. As Director of Organizing, Francisco promotes collaborations with partner organizations to organize, educate, empower, and serve residents of substandard housing in South Los Angeles.

As organizers, Francisco and his team have specific skills to promote trust and community among tenants. Many low-income tenants are distrustful of government agencies; this is especially true for undocumented residents, who fear deportation of one or more adults in the home. ICLC works with government agencies such as the Los Angeles City Housing and Los Angeles County Health Departments to build the trust necessary for the inspection process to work. Through our funding with the HUD Lead Hazard Remediation Program, ICLC organizers visit hundreds of residential units to inform residents about upcoming systematic inspections. Organizers explain the reasons for the inspection, answer questions, and address any concerns. The Housing Department has seen an increase in the number of units they can access after ICLC organizers do a pre-visit to inform tenants. This has a direct impact on the health and safety of tenants because an inspection will result in addressing the housing and health issues.

In addition to supervising all ICLC the campaigns, Francisco leads campaigns in more complicated buildings. Last year, Francisco worked with four government agencies and the local City Council representative to advocate for tenants who were living in an illegally converted office building. Tenants were happy to have a roof over their heads, but the living conditions were exacerbating their health issues. One tenant reported she could not live in her unit because the smell of mold gave her migraines and made her throat swell. Francisco worked to build trust with tenants and hosted meetings to decide what they wanted to do about their housing. After the workshops on health and housing, tenants decided that they could not risk their safety and health anymore, and would rather move out. Francisco and his team advocated for the tenants with government agencies to get the proper inspections at the building. ICLC attorneys stepped in and were able assure that tenants received an average of \$15,000 in relocation benefits so that tenants could find safe and healthy homes.

Francisco has been a member of the Asthma Coalition of Los Angeles County since 2011, and in 2013 became the co-chair of the Indoor Air-Quality workgroup where he led creation of an Indoor-Air Quality Strategic Plan for 2013-2017. He currently serves as the Chair of the Coalition, coordinating collaboration among medical professionals, health educators, nurses,

and policy advocacy groups to reduce asthma disparities in Los Angeles County. Under his leadership, the workgroups have been able to work on bringing trainings to areas of Los Angeles County where Asthma resources are not available, creating culturally-competent literature on healthy housing, systematizing Asthma Action Plans for schools, and advocating for Asthma-friendly policy. Francisco also represents ICLC as an at-large board member for the Southern California Health and Housing Council, which serves as an advisory council to the Los Angeles County Lead Poisoning Prevention Program's Health Education Division.

VII. Past Performance in Reporting on Outputs and Outcomes

ICLC maintains a diversified funding base that includes a variety of grants and contracts for services, to whose sponsors we report regularly on outputs and outcomes. Three most relevant examples are listed below.

Title: REAP-UMP Tenant Outreach Services

Funding Agency: Los Angeles Housing and Community Investment Department

Amount: July 1, 2011-June 30, 2012, \$87,500; new contract July 1, 2012 for \$105,000; renewed at \$105,000 July 2013 and again July 2014.

Goal: maintain 50% tenant participation rate and ensure timely closure of cases.

Outputs reported monthly: Referrals received, properties visited, units visited, units participating in REAP, units paying reduced or regular rent to landlord, vacant units, owner occupied units, cases terminated.

Point of Contact: Roya Babazadeh, Director, Compliance Division, LAHCID.

Title: Lead Hazard Remediation Program

Funding Agency: Los Angeles Housing and Community Investment Department

Amount: 2011, \$39,914; 2012, \$31,504; 2013, \$49,781; 2014, \$47,700 (extended to March 30, 2015).

Outputs reported monthly: Door to door outreach and education; target building meetings; neighborhood meetings/health fairs; referrals of units to LHRP; completed owner's and tenant's applications.

Title: Home for Good Action Plan

Funding Agency: United Way of Greater Los Angeles

Amount: 2011-2012, \$50,000; 2012-2013, \$50,000, 2013-2014, \$49,250

Outcomes Reported Semiannually: Progress toward specific policy goals, including changing Housing Authority rules to better accommodate homeless persons; organizing a stakeholder coalition to prevent passage of a damaging Community Care Facilities Ordinance; mobilizing that coalition to support improved nuisance and code enforcement solutions.

VIII. Quality Assurance Project Plan Information

Yes. The project may implement deed searches to identify property owners. The information gathered may be used for litigation purposes.